



Administration for Children and Families
U.S. Department of Health and Human Services



FY 2016 Office of Head Start ERSEA Monitoring Protocol



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Fiscal Year (FY) 2016 OHS ERSEA Protocol: Overview

Overview

The Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Protocol guides the ERSEA portion of a grantee's Fiscal Integrity/ERSEA Review. This Protocol guides the assessment of a program's practices for verifying the eligibility status of children, families, and pregnant women receiving the program's services and ensuring the appropriate enrollment of children into the program. Programs are also responsible for monitoring children's attendance and offering families support, as needed, when attendance is an issue. By assessing program performance in this area, the Office of Head Start (the OHS) strives to ensure that programs implement practices to assess their communities and recruit and enroll the children and families most in need, including families at or below the poverty line, children with disabilities, families that are homeless, and pregnant women.

Organization of the Protocols

Key Performance Areas

The Protocols organize content into key areas of performance, referred to as **Key Performance Areas** (KPA's). The OHS assesses performance across specific measures within each KPA. The KPAs included in the ERSEA Protocols are as follows:

- 1) Attendance and Participation.** The program monitors daily attendance and supports families whose children are repeatedly absent.
- 2) Eligibility.** The program verifies eligibility and enrolls children and pregnant women according to Federal regulations.
- 3) Enrollment.** The program has practices in place to ensure it maintains funded enrollment, with at least 10 percent of the program's enrollment being children with disabilities.

Compliance Measures

Each KPA contains a series of Compliance Measures (CMs). CMs are specific statements that collectively assess the level of program performance for each KPA, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong systems.

Targeted Questions

Targeted Questions (TQs) for each compliance measure are designed to provide guidance to on-site Reviewers and ensure a standardized method of evidence collection. TQs indicate the people to interview, questions to ask, and information to retrieve from documents.

Eligibility, Recruitment, Selection, Enrollment, and Attendance

ERSEA Key Performance Area #1—Attendance

1.1	When monthly average daily attendance in center-based programs falls below 85 percent (except in the case of illness or well-documented absences), the causes of absenteeism are analyzed, and the program initiates appropriate family support as needed. <i>Note: Applies only to programs with a center-based program option</i>	1305.8(a) 1305.8(b)
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Targeted Questions

Interview—ERSEA Coordinator

ERSEA 1.1

- ▶ With the ERSEA Coordinator, determine whether the program has any concerns related to attendance.
 - How does the program identify children who are absent 4 or more days?
 - How many children have been absent 4 or more days this year?
 - What contact did the program make with parents to determine the reasons for absenteeism?
- ▶ Has attendance fallen below 85 percent?
 - How often has the program fallen below the 85 percent target?
 - What analysis was completed when the program did not meet the expected target?
 - Was a plan developed to improve attendance, and did attendance improve?

Eligibility, Recruitment, Selection, Enrollment, and Attendance

ERSEA Key Performance Area #2—Eligibility

2.1	<p>Program staff verified each child's eligibility and included in each file an eligibility determination record that includes:</p> <ul style="list-style-type: none"> • A statement signed by a program employee identifying the child's eligibility category and the documents examined to determine eligibility. <p><i>Note: For children enrolled after September 1, 2015 the following additional requirements apply:</i></p> <ul style="list-style-type: none"> • Documentation that an in-person or telephone-interview took place, including documentation, if not conducted in person, as to why the interview was not conducted in-person. • Documents or statements program staff used to verify eligibility, including documentation of zero income, self-declaration of income, or verification through third parties. <p><i>Note: Signed statements may list one of the following acceptable forms of proof of eligibility: individual Income Tax Form 1040; W-2 forms; pay stubs, pay envelope, or employers' written statements; documentation showing current status as recipients of public assistance; and declarations of zero income. Also, note that homeless children and foster children are categorically eligible.</i></p>	<p>1305.4(c) 1305.4(d) 1305.4(e) 1305.4(a) 1305.4(i) 1305.4(j) 1305.4(l)</p>
2.2	<p>The program enrolls children who are categorically eligible (who fall within defined income-eligibility requirements).</p> <p>Defined Eligibility Requirements include:</p> <ul style="list-style-type: none"> • Family income below the poverty line. • Family or child receiving public assistance (SSI and TANF). • Homelessness • Child's status as a foster child <p>Additional income-eligibility includes:</p> <ul style="list-style-type: none"> • Ten percent of children enrolled in the program may be over the income threshold • An additional 35 percent of children who are not categorically eligible may be from families whose income is between 100 and 130 percent of poverty <p><i>Note: Being a recipient of food stamps does not, in and of itself, make a child eligible for the Head Start program.</i></p> <p><i>Note: Does not apply to American Indian or Alaska Native grantees</i></p>	<p>645(a)(1)(B)(iii)(I) 645(a)(1)(B)(iii)(II)</p>

2.3	<p>American Indian/Alaska Native (AIAN) programs ensure that children who meet the following requirements are enrolled before enrolling more than 10 percent over-income children:</p> <ul style="list-style-type: none"> • All income-eligible children who wish to enroll living on the reservation • All income-eligible children who wish to enroll and are native to the reservation but are living in non-reservation areas • All income-eligible non-AIAN children whose families wish to enroll if the non-reservation area is not served by another Head Start program <p><i>Note: Applies only to AIAN programs</i></p>	<p>1305.4(b)(3)(i) 1305.4(b)(3)(ii) 1305.4(b)(3)(iv)</p>
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Targeted Questions

Child File Review

ERSEA 2.1

Summary Results for Review of Signed Statement Form:

- ▶ Is an eligibility-determination record available for this child, either hard copy or electronic?
- ▶ (Asked if child enrolled after September 1, 2015) Does the eligibility-determination record contain documentation of an in-person interview conducted with the family to determine eligibility?
- ▶ (Asked if child enrolled after September 1, 2015) Is there documentation that a telephone-interview took place, including documentation as to why the interview was not conducted in-person?
- ▶ (Asked if child enrolled after September 1, 2015) What was the reason a phone-interview rather than an in-person interview occurred?
- ▶ Does the eligibility-determination record contain a statement that identifies the child's verified eligibility status, and is it signed by a program employee?
- ▶ Did the statement indicate which documents were examined in accordance with 1305.4(d) to determine whether the child was eligible to participate in the program?
- ▶ Does the eligibility-determination record contain copies of documents or statements program staff used to verify eligibility, including documentation of zero income, self-declaration of income, or verification through third parties?

- ▶ Indicate the type of documentation retained.
- ▶ Is there record program staff:
 - Secured written consent from the family to contact each third party
 - Documented the name, title, and affiliation/relationship for each third party
 - Obtained information from third parties regarding the family's eligibility

Targeted Questions

Child File Review

ERSEA 2.2

Summary Results for Review of Signed Statement Form:

- ▶ Under which eligibility status did the program enroll the child?
- ▶ Does the eligibility status from your re-determination match the status selected by the program?
- ▶ Select the eligibility status of the child based on the re-determination.

Targeted Questions

Child File Review

ERSEA 2.3

Summary Results for Review of Signed Statement Form:

- ▶ Under which eligibility status did the program enroll the child?
- ▶ Using the documents present in the child file, re-determine the child's eligibility status. Did the program enroll the child using the correct eligibility status?
- ▶ Under which eligibility status should the program have enrolled the child?

Interview—ERSEA Coordinator

ERSEA 2.3

- ▶ Interview the ERSEA Coordinator about the program's enrollment process. Ask him or her to describe the program's enrollment process in detail and provide you with information on how enrollment decisions are made.

Prior to the program enrolling children whose families exceed the low-income guidelines, AIAN programs must ensure it first enrolls:

- All children from Indian and non-Indian families living on the reservation that meet the low-income guidelines and who wish to be enrolled in Head Start
- All children from income-eligible Indian families native to the reservation but living in non-reservation areas approved as part of the Tribe's service area who wish to be enrolled in Head Start

Eligibility, Recruitment, Selection, Enrollment, and Attendance

ERSEA Key Performance Area #3—Enrollment

3.1	<p>Actual program enrollment is composed at least 10 percent of children with disabilities.</p> <p><i>Note: Programs are expected to reach the 10 percent requirement at any point during the program year. For reviews occurring between October and January, the program must have reached 10 percent at some time during the previous program year. For reviews occurring between February and September, the program must have reached 10 percent at some time during the current program year.</i></p>	1308.5(c)(1) 1308.5(c)(2) 1308.5(c)(3) 1308.5(c)(4) 640(d)(1)
3.2	<p>The program enrolls 100 percent of its funded enrollment and ensures an active and ranked waiting list is maintained at all times.</p>	642(g)

Targeted Questions

Interview—ERSEA Coordinator

ERSEA 3.1

- ▶ With the ERSEA Coordinator, review the program’s enrollment documentation and ERSEA tracking system to determine the percentage of children with disabilities enrolled in the program (actual enrollment).
 - If the on-site Monitoring Review occurs between October and January of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the previous program year was at least 10 percent children with disabilities.
 - If the on-site Monitoring Review occurs between February and September of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the current program year is at least 10 percent children with disabilities.

Targeted Questions

ERSEA Coordinator—Interview

ERSEA 3.2

- ▶ With the ERSEA Coordinator, review the program’s waiting list to determine whether it is active. Confirm with the ERSEA Coordinator that the list is maintained throughout the year.

Note: If a program is underenrolled, it is not required to maintain a waiting list; however, this does not preclude the program from having selection criteria and a process for the creation of a waiting list.

- ▶ With the ERSEA Coordinator, review the program’s Enrollment reports for the last 12 months of operation. Determine whether actual enrollment was less than funded enrollment, how long the shortfall existed, and whether the program submitted the reason for any existing enrollment shortfall in its report to the ACF. Document the date(s) the shortfall occurred, whether the information was submitted to the ACF, the reasons submitted, and any additional correspondence with the ACF.

If there are inaccuracies in reporting, or if the reasons for underenrollment have not been submitted to the ACF, ask the ERSEA Coordinator to explain why.

- ▶ Was the program underenrolled at any point over the past 12 months?